

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:

CHAPTER 7

Alicia McGhee
Debtor

BANKRUPTCY NO. 19-356333

JUDGE HON. TIMOTHY A. BARNES

**CREDITOR'S OBJECTION TO DEBTOR'S MOTION TO REOPEN THE
CHAPTER 7 CASE**

Now comes Credit Union 1, a secured creditor, by and through its attorneys, Markoff Law LLC, and respectfully objects to the Debtor's Request to Reopen the Chapter 7 Case, and in support its objection states as follows:

1. On December 18, 2019, the Debtor filed a petition for relief under Chapter 7 of the United States Bankruptcy Code. The Debtor filed the Schedules and Petition on the same day.
2. Credit Union 1 holds a secured claim pursuant to a certain Retail Installment Contract ("Contract") entered by the Debtor and the Creditor on or about January 17, 2019, in which the Debtor granted a security interest in a 2009 Hyundai Sonata.
3. The debtor also has a Signature Loan with the creditor which the parties entered on March 1, 2018.
4. The Signature Loan states, in the Security for Loan Section, Property securing other loans you have with us also secures this loan..."
5. The vehicle contract states the same information. The reaffirmation agreements sent to the debtor reflect this information.

WHEREFORE, Credit Union 1, a secured creditor, respectfully requests that the Court sustain its objection to the Debtor's Motion to Reopen the Chapter 7 Case as there is no justified reason for reopening the case.

/s/ Robert McIntosh
Counsel for Credit Union 1
MARKOFF LAW LLC
9152 Taylorsville Rd, Ste 161
Louisville, KY 40299
Phone: (502) 437-3709
Fax: (502) 709-6008
robert@markofflaw.com

CERTIFICATE OF SERVICE

I hereby certify that on March 2nd, 2021, a copy of the foregoing Objection to the Motion to Reopen the Chapter 7 Case was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

Alicia Unique McGhee
Debtor Pro Se
6027 South Rhodes Avenue
#2
Chicago, IL 60637

Steven R. Radtke
Chapter 7 Trustee
Chill, Chill & Radtke P.C.
79 W. Monroe Street, Suite 1314
Chicago, IL 60603

Patrick S. Layng
Office of the US Trustee, Region 11
2119 S. Dearborn Street
Room 873
Chicago, IL 60604